UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

TELEFONAKTIEBOLAGET LM ERICSSON,
Patent Owner

U.S. PATENT NO. 11,039,312

DECLARATION OF FRIEDHELM RODERMUND IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 11,039,312

TABLE OF CONTENTS

I, Friedhelm Rodermund, do hereby declare as follows:

I. INTRODUCTION AND ENGAGEMENT

1. I have been retained in this matter by Apple Inc. ("Petitioner" or "Apple") to provide testimony regarding 3GPP's standard business practices for record keeping and publishing technical specifications, change request proposals, reports, and other documents developed during the course of standards activities carried out by the 3rd Generation Partnership Project ("3GPP") and the European Telecommunications Standards Institute ("ETSI").

2. I have been asked to provide my opinions regarding the authenticity and dates of public accessibility of the following 3GPP documents:

- T-doc S3-172482, which represents a document with the title "Discussion on protection of Network Steering Information" (hereinafter "S3-172482") (Ex. 1014)
- T-doc S3-191204, which represents a document with the title "K_{AUSF} desynchronization problem and solutions – updated version after conf call on 25 Apr." (hereinafter "S3-191204") (Ex. 1013)
- Draft T-doc S3-19xyza, which represents a document with the title "K_{AUSF} desynchronization problem and solutions" (hereinafter "S3-19xyza") (Ex. 1012)

- Version 15.3.1 of technical specification 3GPP TS 33.501 ("Technical Specification Group Services and System Aspects; Security architecture and procedures for 5G system (Release 15)") (hereinafter "TS 33.501 v15.3.1", Ex. 1006)

3. As an ETSI Project Manager and Secretary, from June 1998 to December 2004, I have personal knowledge of 3GPP's standard business and records keeping practices. I continued following 3GPP's work ever since. Thus, based on my experience, personal knowledge, and review of 3GPP's business records, I am able to testify regarding the authenticity of certain documents published by 3GPP and the timing of their publication.

4. I am also knowledgeable about document management practices and the usage of email reflectors in TSG SA WG3. This is due to the fact that all 3GPP working groups used the same document repository on http://ftp.3gpp.org and all working groups use the same email exploder tool. Thus, I'm able to testify regarding the availability and authenticity of any 3GPP documents and any 3GPP exploder emails.

5. I am being compensated for my time spent on this matter at my usual rate of €450 per hour. My fee is not contingent on the outcome of this or any matter, or on the content of any of the testimony I give in this declaration. I have no financial interest in Petitioner.

6. I have been informed that Ericsson (hereinafter referred to as "Patent Owner") alleges ownership and is the current assignee of U.S. Patent No. 11,039,312 ("the '312 Patent") (Ex. 1001). I have no financial interest in the Patent Owner or the '312 Patent.

II. BACKGROUND AND QUALIFICATIONS

7. I have more than 20 years of experience working with standards development organizations including the Third Generation Partnership Project ("3GPP"), the European Telecommunications Standards Institute ("ETSI"), and the Open Mobile Alliance ("OMA"). I have particular experience with the development of standards related to cellular telecommunications, including the standards for the Universal Mobile Telecommunications System ("UMTS"), Long Term Evolution ("LTE"), and 5G, which are all standards developed by the 3GPP. A true and correct copy of my curriculum vitae (C.V.) is attached as Appendix A.

8. I attended the University of Technology Aachen in Aachen, Germany, where I performed graduate studies in Electrical Engineering with a focus on telecommunications technologies ("Dipl.-Ing. TH" degree). I also attended the University of Technology Trondheim in Trondheim, Norway, and completed my Diploma thesis, "Design of a dual processor computer for digital signal processing in power electronics," in 1993.

DOCKET ALARM

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts

Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research

With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips

Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS
Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS
Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS
Sync your system to PACER to automate legal marketing.